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Attorneys for Defendants
MavorCo Holdings, LLC; MavorCo IP,
LLC; and MavorCo Operations, LLC

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

BLENDTEC INC., a Utah Corporation

Plaintiff,

v.

**BLENDJET INC., a Delaware corporation,
MAVORCO HOLDINGS, LLC, a
Delaware limited liability company,
MAVORCO IP, LLC, a Delaware limited
liability company, and MAVORCO
OPERATIONS, LLC, Delaware limited
liability company,**

Defendants.

**MAVORCO'S MOTION FOR
EXTENSION OF TIME
TO FILE A MOTION FOR LEAVE TO
MAINTAIN DOCUMENTS UNDER SEAL**

Civil No. 2:25-cv-00096-RJS-DBP

Judge Robert J. Shelby

Magistrate Judge Dustin B. Pead

Come now Defendants Mavorco Holdings, LLC, Mavorco IP, LLC, and Mavorco Operations, LLC (collectively “Defendants” or “MavorCo”), by and through counsel, and pursuant to Fed. R. Civ. P. 6(b)(1) respectfully submit this Motion for Extension of Time to File a Motion for Leave to Maintain Documents Under Seal.

Rule 6(b)(1) provides that “[w]hen an act may or must be done within a specified time, the court may, for good cause, extend the time . . . on motion made after the time has expired if the party failed to act because of excusable neglect.” The grounds for this Motion are as follows:

On June 23, 2025, Plaintiff Blendtec Inc. (“Blendtec”) filed its Supplemental Brief in Support of its Motion for a Preliminary Injunction. Dkt. 70. Blendtec filed the unredacted version of that brief under seal, and also filed almost eighty exhibits under seal. Dkt. 70-71. Those exhibits, and the related discussion in the unredacted brief, contain materials that had been produced by BlendJet Inc. (“BlendJet”) in its separate proceeding with Blendtec, and which BlendJet had designated as Confidential and/or Highly Confidential-Attorneys Eyes Only in that proceeding pursuant to the Standard Protective Order. *Id.*

Pursuant to Local Rule DUCivR 5-3(b)(2)(C)(i), BlendJet had until June 30, 2025 to file a Motion for Leave to File Under Seal, to set forth its position as the designating party as to why those exhibits and the related discussion in the brief should be kept under seal by this Court. BlendJet did not file any such Motion.

MavorCo was not a party to the earlier litigation between Blendtec and BlendJet. Nonetheless, MavorCo—having acquired certain of BlendJet’s assets—has an interest in keeping certain of the exhibits and related discussion in the briefing under seal, and submits that good cause warrants granting that relief. It was not clear to MavorCo’s counsel until today that the sealed documents potentially implicated assets acquired by MavorCo unrelated to this trademark dispute.

While Local Rule DUCivR 5-3(b)(2)(C)(i) does not specifically identify the time by which a party in MavorCo's position must file a motion to maintain documents under seal (given that MavorCo is not the designating party under the language in that Local Rule), out of an abundance of caution, MavorCo is treating Local Rule DUCivR 5-3(b)(2)(C)(i) as if it provides the applicable deadline for MavorCo to file a Motion for Leave to Maintain Documents Under Seal. MavorCo therefore seeks leave to file a motion asking the Court to maintain under seal Blendtec's Supplemental Brief and Exhibits 1-62, 64, 67-74, and 76-81 (filed as Dkt. Nos. 72 and 72-1 through 72-77).

MavorCo respectfully requests that the Court consider its Motion to Maintain Under Seal Plaintiff's Unredacted Supplemental Brief in Support of its Preliminary Injunction Motion and Certain Exhibits Thereto ("Sealing Motion"), which is attached hereto as **Exhibit A**, when deciding this issue. MavorCo will be prejudiced if certain documents designated as Confidential and/or Highly Confidential - Attorneys' Eyes Only do not remain under seal because, as set forth in Exhibit A, some of the documents filed appear to discuss confidential and competitive information related to technology acquired by MavorCo. Conversely, Blendtec will not be prejudiced by the very minor delay of this late filing because Blendtec has known, for years, that the documents were designated as Confidential and/or Highly Confidential - Attorneys' Eyes Only, and did not seek to meet and confer with MavorCo regarding sealing prior to filing the documents publicly.

Under similar circumstances, this Court has previously granted motions for extension of time. *See Roberts v. Tim Dahle Imps., Inc.*, No. 2:18-cv-00288-JNP-DBP, 2023 U.S. Dist. LEXIS 148652, at *3-4 (D. Utah Aug. 22, 2023) (granting a short motion for extension of time due to a calendaring error); *see also Rachel v. Troutt*, 820 F.3d 390, 394 (10th Cir. 2016) (stating that Fed. R. Civ. P. 6(b)(1) "should be liberally construed to advance the goal of trying each case on the merits.").

As such, MavorCo respectfully requests that this Court grant its Motion for Extension of Time

and allow MavorCo to file the attached Sealing Motion.

Respectfully submitted, this 2nd day of July, 2025.

/s/Kathryn Tunacik

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CERTIFICATE OF SERVICE

I hereby certify that on July 2, 2025, I electronically filed the foregoing document with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to counsel of record for all parties to this action registered with the CM/ECF system.

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